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8 Counsel for Defendant Cervantes
9

10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION
13

14 UNITED STATES OF AMERICA,
15 Plaintiff,

16 v.

17 DAVID CERVANTES, JAMEZ PEREZ,
18 GEORGE FRANCO, and GUILLERMO
SOLORIO,
19 Defendants.
20

Case No.: CR 21-328 YGR

**DEFENSE AUDIO AND VISUAL
EXHIBITS PLAYED DURING TRIAL**

Court: Courtroom 1, 4th Floor

21 On behalf of all defense counsel, the undersigned submits to the Court all of the electronic
22 audio and visual evidence played for the jury during the trial of this matter by defense counsel, so it
23 will be available for the record and for the jury to review in the courtroom per the Court's ruling
24 denying that extrinsic audiovisual evidence of impeachment will not go back to the jury room. All
25 defendants preserve their objections and request that this evidence go back to the jury room with the
26 other evidence in the case.
27

28 Attached as Exhibit A is a spreadsheet of the exhibits by Defense Exhibit Number. Attached as
Exhibit B and filed manually to the Court is a USB drive containing all of those exhibits in electronic

1 form. The audio and visual files have been shared with government counsel by shared drive.

2 The USB (Ex. B hereto) is labeled "Defense Exhibits Audio/Video Clips played in court." The
3 Exhibit Numbers are 718-1, 743-2, 743-3, 744-1, 747-1, 748-1, 751-1, 751-2, 626-1, 626-3, 630-3,
4 772-7, 663B-1, 781, 670A-1, 681-1, 683C-3, 683C-4, 684B-1, 692A-2, 683C-9, and 683C-10.

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6
7 Dated: September 12, 2024

Respectfully submitted,

8 JODI LINKER
9 Federal Public Defender
Northern District of California

10
11 John Paul Reichmuth
12 JOHN PAUL REICHMUTH
Assistant Federal Public Defenders

13 Counsel for Defendant Cervantes
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Exhibit A: Spreadsheet of Defense Exhibits Played During Trial

UNITED STATES v. DAVID CERVANTES, JAMES PEREZ, GUILLERMO SOLORIO, GEORGE FRANCO
CASE NO. 21-CR-328-YGR

AUDIO VIDEO CLIPS-PLAYED IN COURT

DEFENSE EXHIBIT NO.	BATES NUMBER	WITNESS	DATE PLAYED	DESCRIPTION
718-1	CS_DM_000128	Donald Moran	6/26/2024	Clip 1 7:00 - 7:08, Pg. 9, Lines 2 to 9
743-2	CS_DM_000126	Donald Moran	6/27/2024	Clip 2 - 1:28:10 - 1:28:27, Pg. 85, Lines 16 to 18
743-3	CS_DM_000126	Donald Moran	6/27/2024	Clip 3 - 1:29:55 - 1:30:15 Pg. 87, Lines 23 to Pg. 88, Line 2
744-1	CS_DM_000128	Donald Moran	6/27/2024	Clip 1 - 13:42 - 14:37, Pg. 18, Lines 5 to 24
747-1	CS_DM_000127	Donald Moran	6/27/2024	Clip 1 - 5:45 - 6:03, Pg. 5 Lines 16 to 23
748-1	CS_DM_000124	Donald Moran	6/27/2024	Clip 1 - 20:45 - 20:50, Pg. 15, Lines 9 to 10
748-2	CS_DM_000124	Donald Moran	6/27/2024	Clip 2 - 20:59 - 21:22, Pg. 15, Lines 16 to 22
751-1	CS_DM_000134	Donald Moran	6/27/2024	Clip 1 - 4:00 - 4:33, Pg. 3, Line 22 to Pg. 4, Line 5
751-2	CS_DM_000134	Donald Moran	6/27/2024	Clip 2 - 1:52 - 3:24, Pg. 2, Line 18 to Pg. 3, Line 13
626-1	CS_JC_000113	Joshua Cortez	7/15/2024	Clip 1 - 1:52 - 3:16, Pg. 3, Line 5 to Pg. 4, Line 6
626-3	CS_JC_000113	Joshua Cortez	7/15/2024	Clip 3 - 4:43 - 5:20, Pg. 5, Line 18 to Pg. 6, Line 1
630-3	CS_JC_000117	Joshua Cortez	7/15/2024	Clip 3 - 42:42 - 43:02, Pg. 42, Lines 21 to 25
772-7		Joshua Cortez	7/17/2024	Clip 7 - 13:19 - 13:49, Pg. 5, Lines 19 to 27
663B-1	CS_JS_000329	Joshua Soto	7/31/2024	Clip 1 - 4:46 - 5:57, Pg. 4, Lines 4 to 17
781	CS_JS_001272	Joshua Soto	7/31/2024	9/16/2021 Joshua Soto Jail Call (Clip)
670A-1	CS_DJ_000133	Duane Jefferson	8/5/2024	Clip 1 - 1:29:50 - 1:30:12, Pg. 88, Line 19 to Pg. 89, Line 3
681-1	CS_DJ_000268	Duane Jefferson	8/5/2024	Clip 1 - 15:58 - 16:31, Pg. 1, Lines 5 to 23
683C-3	CS_MR_000451	Matt Rocha	8/12/2024	Clip 3 - 22:08 - 22:25, Pg. 29, Lines 7 to 14
683C-4	CS_MR_000451	Matt Rocha	8/12/2024	Clip 4 - 22:24 - 22:38, Pg. 29, Lines 14 to 22
684B-1	CS_MR_000453	Matt Rocha	8/12/2024	Clip 1 - 42:51 - 43:28, Pg. 46, Lines 1 to 15
692A-2	CS_MR_000663	Matt Rocha	8/13/2024	Clip 2 - 57:43 - 58:06, Pg. 44, Lines 15 to 20
683C-9	CS_MR_000451	Andrew Jimenez	9/4/2024	Clip 9 - 23:33 - 23:52, Pg. 31, Lines 1 to 8
683C-10	CS_MR_000451	Andrew Jimenez	9/4/2024	Clip 10 - 25:11 - 25:30, Pg. 33, Lines 9 to 16

**Exhibit B: USB Drive of Defense Exhibits Played During Trial
(Served on Government By Shared Drive)**

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Counsel for Defendant Cervantes

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
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UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID CERVANTES, JAMES PEREZ,
GEORGE FRANCO, and GUILLERMO
SOLORIO,

Defendants.

Case No.: CR 21–328 YGR

**EXHIBIT B TO DEFENSE AUDIO AND
VISUAL EXHIBITS PLAYED DURING
TRIAL**

MANUAL FILING NOTIFICATION

Regarding Exhibit B to Defense Audio and Visual Exhibits Played During Trial:

This filing is in paper or physical form only, and is being maintained in the case file in the Clerk's office.

If you are a participant on this case, this filing will be served in hard-copy shortly.

For information on retrieving this filing directly from the court, please see the court's main website at <http://www.cand.uscourts.gov> under Frequently Asked Questions (FAQ).

This filing was not efiled for the following reasons:

☐ Voluminous Document (PDF file size larger than efilng system allowances)

☐ Unable to Scan Documents

☒ Physical Object (description): One (1) USB drive

☐ Non Graphical/Textual Computer File (audio, video, etc.) on CD or other media

☐ Item Under Seal

☐ Conformance with the Judicial Conference Privacy Policy (General Order 53).

☐ Other (description):

Dated: September 12, 2024

Respectfully submitted,

JODI LINKER
Federal Public Defender
Northern District of California

/S/

JOHN PAUL REICHMUTH
Assistant Federal Public Defender